




DCUSA Consultation		At what stage is this document in the process?
<h1>DCP 411:</h1> <h2>Charging De-energised sites</h2> <p><i>Date raised: 14 September 2022</i></p> <p><i>Proposer Name: Peter Waymont</i></p> <p><i>Company Name: Eastern Power Networks</i></p> <p><i>Company Category: DNO</i></p>		01 – Change Proposal
		02 – Consultation
		03 – Change Report
		04 – Change Declaration
<p>Purpose of Change Proposal:</p> <p>To remove the different treatment of DUoS with respect to de-energised sites</p>		
	<p>This document is a Consultation issued to DCUSA Parties and any other interested parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 411 'Charging De-energised sites'.</p> <p>The Working Group recommends that this Change Proposal should proceed to Consultation.</p> <p>Parties are invited to consider the questions set in section 8 and submit comments using the form attached as Attachment 1 to dcusa@electralink.co.uk by 5pm on 17 February 2023.</p> <p>The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP).</p>	
	<p>Impacted Parties: Suppliers/DNOs/IDNOs/CVA Registrants</p>	
	<p>Impacted Clauses: Schedule 16, Clause 139</p>	

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Any questions?

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Timetable

The timetable for the progression of the CP is as follows:

Change Proposal timetable

Activity	Date
Initial Assessment Report	21 September 2022
Consultation 1 Issued to Industry Participants	17 November 2022
Consultation 2 Issued to Industry Participants	25 January 2023
Change Report Approved by Panel	15 March 2023
Change Report issued for Voting	17 March 2023
Party Voting Closes	07 April 2023
Change Declaration Issued to Parties	11 April 2023
Change Declaration Issued to Authority	11 April 2023
Authority Decision	TBC

1 Summary of the Change Proposal

What?

- 1.1 Distributors have an obligation to maintain a connection. Associated to this is the maintenance of the capacity of the connection. DUoS is charged to recover the costs of maintaining the connection and the capacity but it is not charged for de-energised sites on site-specific billing or aggregated billing. The D0030 flow which contains aggregated billing data excludes de-energised MPANs in the counts.

Why?

- 1.2 De-energised sites, with site-specific billing, are able to retain capacity on the network without being charged for it under the current methodologies. This arises from Clause 139 of Schedule 16 of the DCUSA. The National Terms of Connection, at Section 3, do not allow DNOs to remove capacity except with the agreement of the customer. So other customers who are energised are faced with enduring capacity charges whereas any de-energised customers can continue to “reserve” the capacity at no charge. This leads to inefficient cost signals being given.
- 1.3 For aggregated billing, to ensure consistency across all customers, MHHS will cause the D0030 & D0315 flows to be replaced and so there is an opportunity to ensure that de-energised sites are included in that new interface, e.g. as a separate MSID count (one count for energised MSIDs and one count for de-energised MSIDs), such that they can also be billed DUoS.

How?

- 1.4 By removing the carve-out for de-energised HH site-specific billed sites (as per Clause 139 of Schedule 16 of the DCUSA) in the methodologies such that these are billed from a point in time and ensuring that the methodologies reflect the charging of DUoS to all de-energised customers.
- 1.5 By adding a de-energised MSID count into the replacement for the D0030 (Aggregated DUoS Report) and D0314 (Non Half Hourly Embedded Network DUoS Report) dataflows (currently known as MHHS REP-002) via the MHHS programme to avoid rework afterwards. This latter would mean any de-energised MPANs that have migrated to MHHS should be charged DUoS, for both half-hourly and non-half-hourly MPANs/sites. This is outside of DCUSA scope to achieve but should proceed in parallel via MHHS (having the count in the interface has other advantages for control and reconciliation even if this DCP to use that data for charging is not approved).

- 1.6 The Proposer is of the view that de-energised customers should be charged fixed and capacity charges in full, as their connection to the network is withholding their contracted capacity from being used by other customers. It is important that the fixed charge is applied to ensure that Customers with separate capacity charges (HH) are not charged differently to those without (NHH) and that provisions are developed in the DCUSA accordingly. The unit charge(s) which would clearly not apply to a de-energised customer, recover the costs to the network which relate to the ongoing use of the assets, and so the Proposer believes this approach maintains cost reflectivity.
- 1.7 The Proposer recognises that there is a period after a connection is completed and before an MPAN is traded where a “de-energised” site is not charged DUoS. This DCP does not intend to change that and is only intended to apply to “Traded” MPANs.

2 Governance

Justification for Part 1 and Part 2 Matter

- 2.1 This Change Proposal is being treated as a Part 1 Matter as it is a methodology change, therefore it will go to the Authority for determination after the voting process has completed.
- 2.2 Following a review of the Consultation responses, the Working Group will work to agree the detail of the solution for DCP 411.

3 Why Change?

- 3.1 To ensure that all customers under measurement classes C and E with site-specific billed sites with allocated network capacity bear the appropriate costs.

Question 1: Do you understand the intent of DCP 411?

Question 2: Are you supportive of the principles of DCP 411?

4 DCP 411 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 411. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.
- 4.2 The Working Group developed the consultation to gather feedback from Parties on the solution the Working Group has developed in the form of changes to the National Terms of Connection, by adding three new paragraphs (see Attachment 3).

- 4.3 The proposed changes would allow a DNO/IDNO to contact de-energised Customers after 6 months of being de-energised, informing them that the DNO/IDNO no longer considers it necessary to maintain the capacity and invite the customer to respond in writing with representations if they disagree. Where capacity is retained, DUoS charges would then apply.
- 4.4 The Working Group proposed three new paragraphs, 12.11A to C, under which the DNO/IDNO would make contact with the customer, and renumbered the existing Paragraphs 12.11A and 12.11B to 12.11D and E respectively (see Attachment 3). The proposed legal text extends the period after which a DNO/IDNO can consider disconnecting a supply from 6 months to 12 months.
- 4.5 The Working Group considered whether there would be any impacts to Suppliers' terms and conditions as a result of making the proposed changes.

Question 3: To suppliers, do you have any concerns that the proposed changes to the National Terms of Connection have an impact on your terms and conditions with your customers? Please provide your rationale.

Question 4: Do you support the changes to the National Terms as regards the 6-month period and the 12-month period, or should different periods apply? Please explain your reasons for your response.

- 4.6 The Working Group discussed the need for Suppliers to be made aware when a de-energised site becomes liable for DUoS charges, following the retention of capacity after the Customer has made representations to do so.

Question 5: How should a DNO make it known to a Supplier that it will charge for a particular de-energised site that wants to retain its capacity?

- 4.7 The Working Group discussed that in charging some de-energised sites DUoS, the DNO/IDNO and Suppliers would be charging a subset of de-energised sites. The Working Group agreed it should gather feedback on any challenges presented by this.

Question 6: Are there any impacts or challenges of charging a subset of de-energised sites?

- 4.8 The Working Group discussed whether this proposal may impact upon consumers in vulnerable situations. Whilst the proposed change specifically targets measurement classes C and E, and thus would not affect any customers under measurement class A, the Working Group agreed it would be necessary to understand any potential impacts on consumers in vulnerable situations (e.g., a consumer who is not the bill payer).

Question 7: Are there any impacts to consumers (who may differ from the bill payer) in vulnerable situations, or could consumers be put in a vulnerable situation, as a result of charging de-energised sites?

5 Legal Text

5.1 The draft legal text is provided as attachment 3 to this consultation.

Question 8: Do you have any comments on the proposed draft legal text? Please provide your rationale.

Question 9: Are there any other consequential changes to the DCUSA legal text as a result of the proposed changes? Please provide your rationale.

6 Impacts & Other Considerations

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

6.1 This change could be impacted by the expected DUoS SCR, but at the current time this SCR has yet to commence. Currently the work on MHHS is progressing at pace and so now would seem to be an opportune moment when the data and dataflows are changing to consider this change.

Does this Change Proposal Impact Other Codes?

BSC.....	<input checked="" type="checkbox"/>	MRA.....	<input type="checkbox"/>
CUSC.....	<input type="checkbox"/>	SEC.....	<input type="checkbox"/>
Grid Code.....	<input type="checkbox"/>	REC.....	<input checked="" type="checkbox"/>
Distribution Code..	<input type="checkbox"/>	None.....	<input type="checkbox"/>

Consideration of Wider Industry Impacts

6.2 MHHS programme interface definition and processes for compiling DUoS billing flows.

6.3 The Working Group considered that there may be a potential for impacts to the REC, Schedules 8 (Unbilled Energy Code of Practice), 14 (Metering Operations), 23 (Registration Services), 27 (The Registerable Measurement Point [RMP] Lifecycle) and 30 (Resolution of Consumer Facing Switching and Billing Issues).

- 6.4 In their first consultation, the Working Group explored whether de-energised sites are charged at transmission level. However, the consultation responses did not give a conclusive answer to that question.

Question 10: Are you aware of any impact on other industry codes of this Proposal?

Question 11: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

Confidentiality

- 6.5 This change proposal is not being treated as confidential.

7 Code Specific Matters

Reference Documents

- 7.1 There are no reference documents included with this consultation.

8 Consultation Questions

- 8.1 The Working Group is seeking industry views on the following consultation questions:

No.	Questions
1	Do you understand the intent of DCP 411?
2	Are you supportive of the principles of DCP 411?
3	To suppliers, do you have any concerns that the proposed changes to the National Terms of Connection have an impact on your terms and conditions with your customers? Please provide your rationale.
4	Do you support the changes to the National Terms as regards the 6-month period and the 12-month period, or should different periods apply? Please explain your reasons for your response.
5	How should a DNO make it known to a Supplier that it will charge for a particular de-energised site that wants to retain its capacity?
6	Are there any impacts or challenges of charging a subset of de-energised sites?
7	Are there any impacts to consumers (who may differ from the bill payer) in vulnerable situations, or could consumers be put in a vulnerable situation, as a result of charging de-energised sites?

8	Do you have any comments on the proposed draft legal text? Please provide your rationale.
9	Are there any other consequential changes to the DCUSA legal text as a result of the proposed changes? Please provide your rationale.
10	Are you aware of any impact on other industry codes of this Proposal?
11	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

8.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than **5pm on 17 February 2023**.

8.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate if their response, or part thereof, is to be treated confidentially.

9 Attachments

- Attachment 1 - DCP 411 Consultation Response Form
- Attachment 2 - DCP 411 Change Proposal Form
- Attachment 3 - Draft Legal Text